

# EXHIBIT 1

Defendants' Categorical Privilege Log<sup>1</sup>

	<b><i>Date Range<sup>2</sup></i></b>	<b><i>Document Type(s)</i></b>	<b><i>Sender(s), Recipient(s), Copyee(s)<sup>3</sup></i></b>	<b><i>Category Description</i></b>	<b><i>Privilege<sup>4</sup></i></b>
1	10/4/13-9/5/18	Emails and .pdf, Word and Excel documents	Chase Robinson, Robert De Niro, Peter Grant, Esq., Nellie Norden, Christine O'Leary, Steven Lashever, Anthony Hillsberg, Stan Rosenfield, Josh Lieberman, Morgan Billington and Peter Hess	Communications and documents involving transactional legal counsel for Canal Productions, Inc. ("Canal") and/or Robert De Niro, between and among Mr. De Niro, various Canal personnel and/or external consultants	Attorney-client communications; attorney work product
2	4/7/19-8/21/19	Emails and .pdf, .png, Word and Excel documents	Gillian Spear, Michael Kaplan, Tiffany Chen, Thomas Harvey, Esq., Mr. De Niro, Sabrina Weeks-Brittan, Michael Tasch, Lulu White, Chase Robinson's mailbox, Laurent Drogin, Esq., David Kleinmann, Esq., Nellie Norden, Morgan Billington, Katherine Wernet and Robin Chambers	Communications and documents exchanged between and among Canal's general legal counsel, its external legal counsel, Mr. De Niro, various former or current Canal personnel and/or external consultants and others	Attorney-client communications; attorney work product
3	9/9/14-9/18/19	Emails and .pdf, .png, Word and Excel documents	Chase Robinson, John Hackett, Esq., Michael Tasch, Morgan Billington, Thomas Harvey, Esq., Mr. De Niro, Michael Kaplan and Gillian Spear	Communications and documents exchanged between and among Canal's general legal counsel, Chase Robinson, Mr. De Niro and various Canal personnel and/or external consultants	Attorney-client communications; attorney work product

<sup>1</sup> Pursuant to the Stipulation and Order Regarding Production of Electronically Stored Information ("ESI") (Dkt. No. 29), this privilege log does not include (a) internal communications within Traub Lieberman Straus & Shrewsbury LLP ("TLSS"), (b) communications between TLSS and (i) Defendant Robert De Niro, (ii) Sabrina Weeks-Brittan, Gillian Spear, and Michael Kaplan if they remain Canal personnel, and/or (iii) Tom Harvey, Esq.; or (c) materials created by TLSS as part of the investigation or litigation of this case.

<sup>2</sup> The dates identified herein are based on the technical capabilities of the ESI platform in use.

<sup>3</sup> Please note that this column of information encompasses communications that may only involve two of the identified individuals, depending on the particular communication. In other words, not every single communication identified herein involves all of the individuals specified in this column.

<sup>4</sup> Defendants expressly reserve, and do not waive, all rights to modify and supplement the proffered privilege justifications offered herein or other aspects of this log.

4	10/9/19-10/22/19	Emails and .pdf documents	Thomas Harvey, Esq., Sabrina Weeks-Brittan, Gillian Spear, Jeffrey Vita, Esq., Michael Tasch, Grace Hebbel, Esq. and Lynn Mitel	Communications and documents exchanged between and among Canal's general counsel and external legal counsel relating to pending federal court action	Attorney-client communications; attorney work product
5	8/20/19-2/4/20	Emails and .pdf, .png and Word documents	Laurent Drogin, Esq., David Kleinmann, Esq., Lisa White, Gillian Spear, Michael Kaplan, Thomas Harvey, Esq., Mr. De Niro, Sabrina Weeks-Brittan, Michael Tasch, Stan Rosenfield, Tiffany Chen, John Hackett, Esq., Mark Bosswick, Jane Rosenthal, Josh Lieberman, Lawrence Shire, Esq., Peter Grant, Esq., David Earls, Michael Schmidt, Tina McDonald, Jeff of Casswood, Robin Chambers, Sandy O'Hearn and Rommel Maxwell	Communications and documents exchanged between and among Canal's general counsel, external legal counsel, Mr. De Niro, various former or current Canal personnel and/or external consultants and others relating to federal or state court actions	Attorney-client communications; attorney work product
6	7/1/14-5/31/19	Emails and .pdf, .png and Word documents	Laurent Drogin, Esq., Chase Robinson, Thomas Harvey, Esq., James Harkins, John Hackett, Esq., Mark Bosswick, Michael Kaplan, Michael Tasch, Tara Toevs Carolan, Esq., Hagit Feder and Elizabeth Zaikowski	Communications and documents exchanged between and among Canal's general legal counsel, its external legal counsel and/or investigators, Chase Robinson, Chase personnel, and various external Canal consultants	